

# EXHIBIT 19

## [Filed Under Seal]

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**From:** Ivens, Keith  
**Sent:** Thursday, June 23, 2016 3:33 PM  
**To:** Baxter, John; Hall, Keith; Nalley, Michael; Lappin, Harley  
**Cc:** Baxley Jr, Stephen  
**Subject:** RE: Cibola

The Joint Commission is the most pressing issue. The failures in last week's report are so profound, I don't see them passing. Meeting minutes neglected for months cannot be brought in compliance.

As for the clinical reviews, care is better, but not good enough. More reviews will only confirm the notion that the providers are not good enough. After 5 months on the job, CCS finally did their first peer review. Too little, too late.

*Keith Ivens, MD, FACCP*

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**From:** Baxter, John  
**Sent:** Thursday, June 23, 2016 3:12 PM  
**To:** Hall, Keith <Keith.Hall@cca.com>; Nalley, Michael <Michael.Nalley@cca.com>; Lappin, Harley <Harley.Lappin@cca.com>  
**Cc:** Ivens, Keith <Keith.Ivens@cca.com>; Baxley Jr, Stephen <Stephen.BaxleyJr@cca.com>  
**Subject:** Fwd: Cibola

Just wanted you to be aware we are pushing to get the clinical reviews started soonest. I just ended a call with Dr. Ilyas and am waiting for a return call from Ike.

John Baxter  
Vice President of Health Services  
Corrections Corporation of America

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Begin forwarded message:

**From:** "Baxter, John" <[John.Baxter@cca.com](mailto:John.Baxter@cca.com)>  
**Date:** June 23, 2016 at 3:08:12 PM CDT  
**To:** "Baxley Jr, Stephen" <[Stephen.BaxleyJr@cca.com](mailto:Stephen.BaxleyJr@cca.com)>  
**Cc:** Louis Eichenlaub <[LCEichenlaub@CorrectCareSolutions.com](mailto:LCEichenlaub@CorrectCareSolutions.com)>, "[Mllyas@correctcaresolutions.com](mailto:Mllyas@correctcaresolutions.com)" <[Mllyas@correctcaresolutions.com](mailto:Mllyas@correctcaresolutions.com)>  
**Subject:** Re: Cibola

Thank you for the update Steve. I'm cc'ing Dr. Ilyas and Ike Eichenlaub so they are aware of our concerns.

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On Jun 23, 2016, at 3:01 PM, Baxley Jr, Stephen <[Stephen.BaxleyJr@cca.com](mailto:Stephen.BaxleyJr@cca.com)> wrote:

John,

I have been reviewing the CFM findings and am concerned that there is not a current process in place for monitoring of clinical issues. Betty Judd and Kevin Martin spend their days pulling rosters and addressing concerns around the CFM. The areas not being addressed by them are clinical concerns. I have spoken to Eddie Somalia about meeting at least a couple times a week to address the CFM findings. He has explained to me that he will have people in place to handle the clinical concerns in the future. My concern is that clinical issues are not being addressed now and that a review of areas such as HTN, Diabetes and Hep C need to be looked at on a daily basis. My plan would be to assign individuals to areas of concern (CFM) and meet no less than twice a week to discuss the progress. I truly cannot find tracking of clinical issues, a process to make them better or indication that progress has been made with the CFM findings on clinical concerns. It seems that concerns from Betty and Kevin are being addressed reactively instead of proactively. Mr. Somalia has explained to me that he is not as worried about the CFM as he is the Joint Commission findings especially if there is a mid- August review. He said that he would reach out to his people about a twice a week meeting but wanted the QA person that they are going to hire involved..